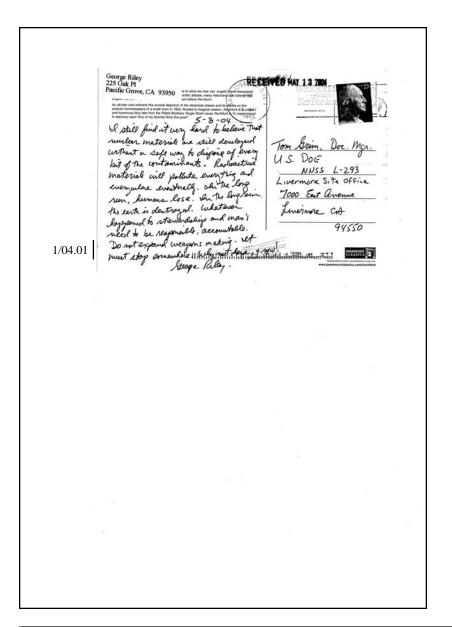
Riley, George Page 1 of 1



Riverwoman, Barbara Page 1 of 1

2120 N. Pacific Au #46 Santa Cruz. CA 9 5060 Dear Mr. Srin, How can we stop this? were you, or some other heroe's person, skep out orde the cure of modners in which we are imprisoring ornaelue. are us capable, as a race, of revering the terrible such 1/04.01 towards suf dextruction? Why would me deliberately pour our planet, pour ourselves. Why would we create weapons of mess dustrustion as we bomb other for anding mesons of men destruction What of you stake up? you would love you The. I would send you northly clerk to telp you water you got a new gos. I bet Thousands of other would too. Heere do something Parkara Zivermomen s. I am on early chedhood educatorin a lacel community carlege and a granding then. PPS My friend Jody sand she will also help.

2-482

Rothenberg, P.E., Keith Page 1 of 2

May 21, 2004

Mr. Tom Grim, Documents Manager DOE, NNSA, L-293 7000 East Avenue Livermore, CA 94550

Dear Mr. Grim,

My name is Keith Rothenberg and I have been a homeowner in Livermore, CA since 1983. I am a native Californian and my family has resided in the Modesto area since 1920. I am an energy efficiency engineer and I own a business that reduces energy consumption in industrial and commercial buildings. I am the founder and current director of the Friends of Sycamore Grove, a local environmental group promoting the health and sustenance of California's 3rd largest stand of Sycamore trees.

I have familiarized myself with the Site-Wide Environmental Impact Statement and the Lab's 10-year plan for Site 300. I am deeply concerned about the potential impact on the wildlife at Site 300, as well as about the air quality for residents of Tracy and the larger 2/04.02 Central Valley. I understand that the lab is proposing to build a 40,000-square foot high explosives processing facility with four magazines storing up to 3000 pounds of high explosives. I also understand that open air explosives testing on a weekly to daily basis is proposed just one mile from the site's northern border.

3/16.05

As a conservationist, I am concerned about the preservation of California's wildlife and endangered species. The proposed explosives testing may injure or kill Golden Eagles, Prairie Falcons, Northern Harriers, Black-Shouldered Kites, Ferruginous Hawks and Red-Tailed Hawks due to flying debris and shock overpressure. Your operations under any alternative could also affect SIX federally listed endangered or threatened or candidate species due to possible disturbance of habitat. These are the CA Red-Legged Frog, CA Tiger Salamander, Alameda Whipsnake, San Joaquin Kitfox, Valley Elderberry Longhorned Beetle and the Large-Flowered Fiddleneck (which was thought to be extinct in California.)

4/16.03 Plans in the SWEIS also require a greater than ever "take" of wildlife and violate the DOE'S current agreement with the US Fish and Wildlife to limit the harm and killing of wildlife to 25 species. The plan further proposes the "termination" of a wetland known as a breeding pond for the CA Red-Legged Frog and, alternatively, creating a wetland at the 5/16.02 Sharp Facility which is known to have "low concentrations" of tritium. I find these plans

Site 300 is amidst one the largest native grasslands of this kind currently known in 6/16.04 California. Considering the disruption to the grasslands and the many wildlife threats mentioned above, the SWEIS plan is out of line in its proposed destructive impact on nature and habitat

Rothenberg, P.E., Keith Page 2 of 2

7/08.01

8/24.02

I believe that it is essential to preserve the state's remaining plant and animal refuges. Please move open air testing to deserted places where fewer species reside. The storage and testing of explosives should occur in an area of the country where there are limited pressures of population growth and agriculture. Why add pollutants to the already compromised air quality of the growing central valley? Tracy already has an elevated inhalation cancer risk, as do Manteca and Stockton. Do not execute a plan which will increase air and ground pollution and which will further deplete our local our wildlife heritage, particularly the endangered and at-risk species.

Keith Rothenberg, P.E. 23 Diamond Dr.

Livermore, CA 94550

CC: Senators Diane Feinstein and Barbara Boxer, Rep. Ellen Tauscher

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San Francisco Bay Regional Water Quality Control Board, Naomi L. Feger, Remedial Project Manager Page 1 of 1

Sarvey, Bob Page 1 of 8

01606 RECEIVED MAY 2 1 2004 Grim, Tom Naomi Feger [Nif@rb2.swrcb.ca.gov] Friday, May 21, 2004 3:37 PM tom.grim@oak.doe.gov re LLNL SWEIS Naomi Feger.vcf (295 B) Dear Mr. Grim - I would like to request an extension to the comment period on the LLNL Sitewide EIS. The public notice advising that the public comment period closes on May 27, 2004 was received in this office on May 20, 2004 and I will be unable to complete my review by that date. Please allow a 30-day extension to this deadline. Very Truly Yours, Naomi Feger Naomi L. Feger Remedial Project Manager SF Bay RWQCB 1515 Clay Street, Suite 1400 Oakland, CA 94612

Apri 15, 2004

Thomas Grim, Livermore Site Office Document Manager NNSA

7000 East Avenue, MS L-293 Livermore, CA 94550-9234

Fax: (925)422-1776 Email: tom.grim@oak.doe.gov

RE: DOE/EIS-0348 and DOE/EIS-0236-S3

Dear Mr. Grim:

On behalf of TRAQ, representing residents of Tracy and San Joaquin County, I wish to thank you for the opportunity to make these comments. Our comments focus on Site 300, Livermore Lab's high explosives test site in Tracy:

 Radioactive tritium (or any other radioactive substance such as depleted uranium) should not be allowed in "shots" --test explosions -- at Site 300 nor in environmental testing of explosives assemblies that release radioactive tritium into the environment.

1/17.01

Detonation experiments containing tritium at Site 300 firing tables or the Building 801 Contained Firing Facility, resulting in a maximum annual tritium emissions of 200 curies in the No Action Alternative are unacceptable. Even the current allowable 150 curie limit is unacceptable.

The community was assured in the 1992 SWEIS public hearings that no tritium would be used in shots. Please describe what is actually occuring in terms of releases of radioactive substances being used in shots, environmental testing of explosives assemblies or in other experiments.

2. No increased dose to workers or the community should be allowed.

2/23.01

The ionizing dose to the general public was 0.5 person-rem per year from the Livermore site and 2.5 person-rem per year from Site 300 in 2002. The population dose to the general public under all three alternatives would increase to 1.8 person-rem per year from the Livermore Site and 9.8 person-rem per year from Site 300. the corresponding LCFs for all three alternatives would be 1.1 x 10 to the minus 3 from the Livermore site and 5.9 x 10 to the minus 3 from Site 300.

 Please provide agreements and arrangements made with fire protection, police, 3/29.01 security and emergency services for incidents that may occur at Site 300.

These arrangments and agreements must be available in order for the community to evaluate their adequacy. This information should include incidents that occur when

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3/29.01 cont.	explosives or other potentiall harmful hazardsous, radiological or biological substances are being transported to or from Site 300 via car, truck or airplane. This information should include potential impacts on local airports, too.
• • • • • • • • • • • • • • • • • • • •	4. Do Not Increase Dangerous Projects in a Seismically Active Area
4/14.01	• Many buildings at LLNL have potential seismic difficulties. Some buildings at LLNL do not comply with federal seismic standards, have unacceptable seismic risks, need "detailed evaluation" to determine the seismic risk level including buildings where hazardous, radioactive or other substances that may harm the public or the environment are stored or involved in work processes. Please describe in detail all of these buildings at Site 300 and how they are used and what measures are being taken or planned to bring them up to code and when.
4/14.01	- At least two fault run through Site 300 and others run near Site 300. There is a lot of uncertainty around the amount of hazard that these faults pose. The lab should error on the side of caution and not explosive processing and storage facilities near or in the vicinity of these fault areas. Please describe the relationship of all planned activities to fault zones, potential harms/damages from an earthquake at the highest reasonably expected level and what if any precautions have been or will be taken to mitigate harm.
	 The faults that run through Site 300 are not well understood, particularly how they might divert radioactive or hazardous groundwater plumes to new pristine water bodies or soil that rain could then carry to pristine waters. Please elaborate on this issue in the SP/SWEIS.
	 In January of 1980 – 5.9 Quake along Greenville Fault in Livermore Area – Injured 44 people – Cost lab 10 million. Please describe if any damage has been done to Site 300 by earthquakes in the past or if damage is anticipated if a large quake should occur on a fault in Site 300 or within an area that could impact Site 300.
5/16.04	2. Preserve the local Environment and protect Endangered Species The lab's site 300 "could be judged one of the largest native grasslands of this kind currently known in California." Please describe if there are other comparable grasslands and the value of this land, particularly in view of the fact that resources of this type continue to be lost. Please determine if there are other sites where the explosives tests could occur that would allow this grassland to be preserved. We would like to see a cost-benefit analysis with alternatives evaluated.
6/25.03	 At this site the Lab is proposing to build a new Energetic Materials Processing Center, a 40,000-square foot (High Explosives) processing facility with four magazines for storing up to 3,000 pounds of high explosives. Please describe the range of possible impacts should the high explosives detonate accidentally and unexpectedly.
7/16.05	 Explosives Testing will occur one mile from sites Northern Border, on a "weekly to daily" basis that will primarily affect birds. "Diurnal raptors that forage directly over the facilities are the species most vulnerable to flying debris and shock overpressure."

Some of the birds listed as possibly affected include the Golden Eagle, Prairie Falcon, 7/16.05 Northern Harrier, Black-Shouldered Kite, Ferruginous Hawk and Red-Tailed Hawk. What other impacts might this testing have? What will the potential impact be on these cont. bird populations and their habitat. Is there other habitat that it is realistic to expect them to use? Operations under any alternative could potentially affect six federally listed endangered, threatened, proposed threatened, or candidate species due to potential disturbance of habitat including the California Red-Legged Frog and the California Tiger Salamander. Please describe specifically the potential impacts on these populations. What other animals or plants may be affected? 8/16.03 Plans in the SWEIS will violate the DOE's current agreement with the US Fish & Wildlife to "take" (to harm or kill) 25 species - new projects will require a greater "take". Are there alternatives that would prevent or lower the rate of death of these species by modifying your work processes, making do with current buildings, conducting tests somewhere else? A plan to "terminate" a wetland that is a known breeding pond for the California Red-Legged Frog which has been observed breeding there for the past six years. A possible mitigation measure suggested for this proposal is to create a wetland at the Sharp Facility, which they admit, is known to have "low concentrations" of tritium 9/16.02 (radioactive hydrogen). Please review studies of potential tritium impacts on frogs that are taken from scientists that have different views on this subject, so that an objective range of opinions is available for the community to review. 5. Do not allow increases in waste generation that increase contamination to the air, water or soil at Site 300. The proposed plan woould allow waste management activities to change to accommodate increased waste generation. Proposed changes would include modifying 10/22.02 the permit status of existing facilities to allow different types of waste to be stored or treated, e.g. obtaining hazardous waste facility permits for areas now used for nonhazardous or radioactive waste management. The potential issuance of permits in the proposed plans that would increase the allowable amounts of hazardous chemicals at LLNL necessitate an analysis in the SP/SWEIS of the environmental impact of these chemicals and other subustances No uncontaminated areas should be contaminated. Safe practices should be the top priority and no current standards, regulations or permits should be modified in any way 11/24.02 that allow greater levels of contaminants. Please describe thoroughly if and how increases in contaminants to the air and soil may take place. No pristine water should be polluted and if this is to take place, please provide details about possible contaminants, levels, proposed mitigation, and risks involved.

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cont.

Production or waste should not be increased unless we can be assured that the waste stream will not further pollute Site 300, harm workers or caused an increased risk to Tracy, located 2 miles from the site or other areas. If this previous statement is not true, please describe how, why and occupational protections for workers. 10/22.02 cont. What procedures will LLNL use to reduce or maintain current waste stream levels? If waste stream levels will increase, what will the NEPA process be to address the environmental impacts of such increases? 6. All decontamination and decommissioning activities have not been throughly taken into consideration and should be. Please be sure all radiological and nonradiological air quality and decontamination and decommissioning (D&D) is described at Site 300. Also please be sure that the EIS does take into consideration the full range of contaminants that D&D activities may involve. For example, if asbestos contamination is addressed, the discussion must also address any of the other contaminants that may exist in a facility as a result of the 12/17.03 particular scientific research that is conducted at Site 300. Discussion of the potential air quality effects of D&D from other sorts of contaminants should be incorporated into the EIS. Buildings or floorspace marked for D&D may have been the site of unique exposure to contaminants that, although not common to all of the D&D activities, warrant consideration because of the singular problems they may Also, tthe potential effects on air quality from both the transportation and eventual disposal/storage of contaminated demolished facilities needs to be taken into account. The potential for adverse air quality effects exists not only at LLNL, but also at any facility to which D&D materials are transported, as well as the regions through which the materials are transported. Such discussion should be incorporated in the EIS. 7. Please complete the National Register of Historic Places evaluation particularly of subsurface prehistoric cultural resources. In addition, vertebrate fossil, shells, leaves and stem deposits at Site 300 should be evaluated further. 13/11.01 We may have unknown treasures buried in the hills at Site 300 that are far more valuable than using the land for test explosions. Learning the extent of possible prehistoric treasures would better allow protection of such resources and an adequate cost-benefit analysis to determine the best use of this land. 14/06.01 Generally speaking, we hope you will reconsider the Proposed Action alternative and instead chose the reduced action alternative. Livermore Lab should be placing its major resources into research on global warming, energy alternatives -- to end our dependence 15/02.01 on oil, and cleanup technologies for areas already contaminanted by radioactive, chemical and biological weapons and waste. Continued and more aggressive nuclear weapons 16/04.01 development and research and research on high-level and genetically-modified biowarfare

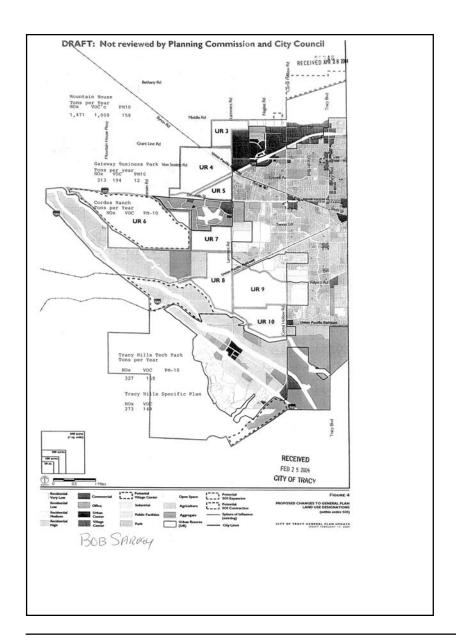
16/04.01 agents further harm our environment, public health, economy and undermine our national security.

Once again, let me say that we appreciate the opportunity to be involved in the public hearing process and commenting on the SP/SWEIS that will impact our environment, health and security for the rest of our lives and the lives of our children and grandchildren.

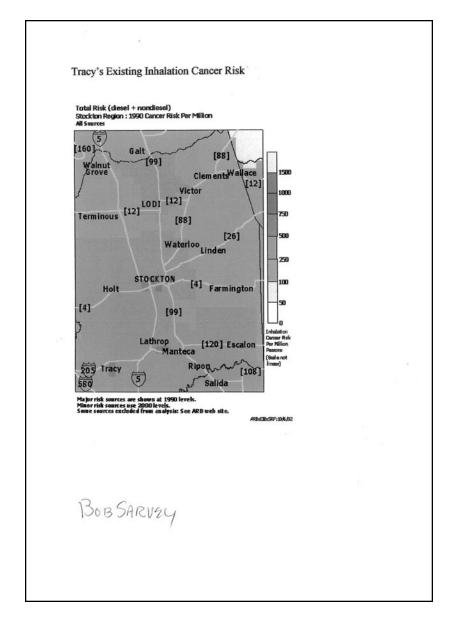
Sincerely,

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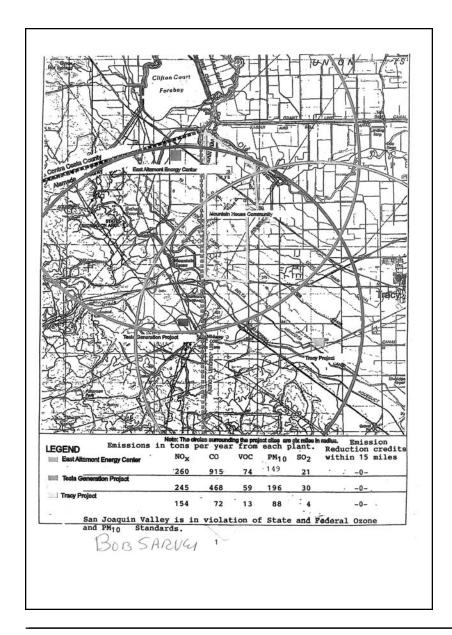


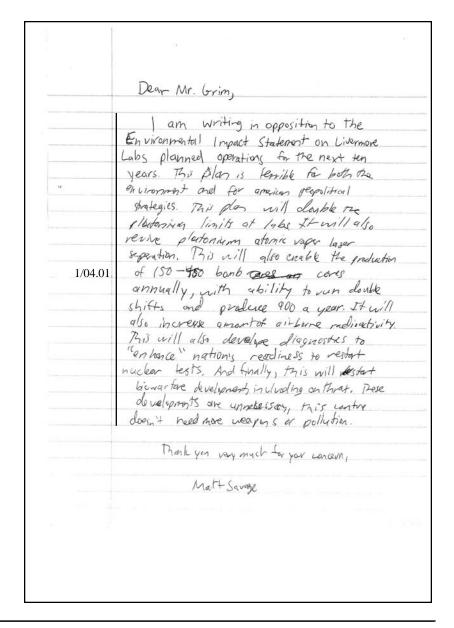
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